

EXHIBIT B

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO.

SANTA LIDIA ESQUIVEL,)
 Plaintiff,)
)
V.)
)
TARGET CORPORATION,)
 Defendant.)

COMPLAINT AND DEMAND FOR JURY TRIAL

Now comes Santa Lidia Esquivel, plaintiff in the above-captioned action and hereby files

_____ this Complaint and shows the Court as follows: _____

FACTS COMMON TO ALL COUNTS

1. The plaintiff, Santa Lidia Esquivel, is an individual residing in Malden, Middlesex County, Massachusetts.
2. The defendant, Target Corporation ("Target"), is a duly organized corporation with its principle place of business located at 1,000 Nicollet Mall in Minneapolis, Hennepin County, Minnesota.
3. Service may be made upon the defendant, Target, through its registered agent, CT Corporation System, located at 155 Federal Street, Suite 700, in Boston, Suffolk County, Massachusetts.
4. On or about June 8, 2010, the defendant, Target, was the owner and in control of a Target store located at 174 Somerville Avenue in Somerville, Middlesex County, Massachusetts.

5. At all relevant times, the defendant, Target, was responsible for maintaining a safe environment on the premises of the store.
6. On or about June 8, 2010, the plaintiff, Santa Lidia Esquivel, was lawfully on the premises of the store.
7. At all relevant times, the plaintiff, Santa Lidia Esquivel, was in the exercise of due care.
8. On or about June 8, 2010, the defendant, Target, allowed a foreign substance to remain on the floor of the premises of the store.
9. The defendant, Target, knew, or in the exercise of due care should have known, that there was a foreign substance on the floor of the premises that was creating an

unreasonably dangerous and unsafe condition.

COUNT I

(Negligence –Target)

10. The plaintiff, Santa Lidia Esquivel, restates and incorporates by reference the allegations contained in paragraphs one (1) through nine (9) as if set forth here in their entirety.
11. The defendant, Target, negligently cleaned, maintained, inspected, and monitored the premises of the store, allowing a foreign substance to remain on the floor of the

premises, thereby creating an unreasonably dangerous and unsafe condition.
12. As a direct and proximate result of the negligence of the defendant, Target, the plaintiff, Santa Lidia Esquivel, was caused to slip and fall.

13. As a direct and proximate result of the negligence of the defendant, Target, the plaintiff, Santa Lidia Esquivel, has suffered and will continue to suffer great pain of body and anguish of mind; her ability to work and perform her usual activities has been restricted; her health has been impaired; she has been required to spend sums of money for his continued medical care and treatment; and her ability to enjoy a normal life has been adversely affected.
14. WHEREFORE, the plaintiff, Santa Lidia Esquivel, requests that judgment be entered against the defendant, Target Corporation, plus interest, costs and reasonable attorney's fees.
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COUNT II

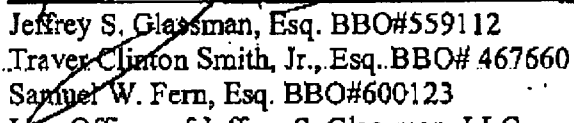
(Failure to Warn – Target)

15. The plaintiff, Santa Lidia Esquivel, restates, and incorporates by reference the allegations contained in paragraphs one (1) through nine (9) as if set forth here in their entirety.
16. The defendant, Target, negligently failed to provide adequate warnings to the plaintiff, Santa Lidia Esquivel, that there was a foreign substance on the floor of the premises of the store that was creating an unreasonably dangerous and unsafe condition.
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17. As a direct and proximate result of the negligence of the defendant, Target, the plaintiff, Santa Lidia Esquivel, was caused to slip and fall.

18. As a direct and proximate result of the negligence of the defendant, Target, the plaintiff, Santa Lidia Esquivel, has suffered and will continue to suffer great pain of body and anguish of mind; her ability to work and perform her usual activities has been restricted; her health has been impaired; she has been required to spend sums of money for his continued medical care and treatment; and her ability to enjoy a normal life has been adversely affected.
19. WHEREFORE, the plaintiff, Santa Lidia Esquivel, requests that judgment be entered against the defendant, Target Corporation, plus interest, costs and reasonable attorney's fees.

PLAINTIFF HEREBY DEMANDS TRIAL BY JURY ON ALL COUNTS

Respectfully submitted,
Plaintiff, Santa Lidia Esquivel,
By her attorneys,



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Dated: _____